

September 4, 2020

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Hon. P. Kevin Castel
United States District Court
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Conference Adjourned

From:

9/9/2020

To:

September 21, 2020 at 12 p.m.

SO ORDERED.

P. KEVIN CASTEL, U.S.D.J.

Date:

9-8-20

Re: *Zornoza v. TerraForm Global, Inc., et al.*, Case No. 18-cv-11617 (PKC); 16-md-2742

Dear Judge Castel:

We submit this letter on behalf of Defendants in the above-referenced action to request that the Initial Pretrial Conference currently scheduled for September 9, 2020 at 12:00 p.m. be adjourned until September 18, 2020 (or whatever subsequent date the Court prefers). On September 3, 2020, the Court issued an order (the "Order," Dkt. No. 77) scheduling the Conference and directing the parties to (1) confer on a Case Management Plan, and (2) submit a joint letter five business days before the Conference containing a description of the case, contemplated motions, and the prospect for settlement. At the time the Court's order issued, however, the deadline to submit the joint letter in advance of the September 9, 2020 Conference had already expired.

In order to permit the parties sufficient time to confer on a Case Management Plan to be submitted in advance of the Conference as specified in the Order, and to submit a joint letter in accordance with the Court's instructions, Defendants respectfully request that the Initial Pretrial Conference be adjourned until on or after September 18, 2020. Defendants have conferred with Plaintiff, who does not oppose the request for adjournment. This is the first request for adjournment of this Initial Pretrial Conference.

Respectfully submitted,

By: /s/ Timothy J. Perla

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cc: All Counsel of Record